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ENZO ZELOCCHI  
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Plaintiff, in pro per

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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

RY: mpv

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

**ENZO ZELOCCHI**, an individual,  
Plaintiff,

vs.

**ADAM IZA**, an individual; **IRIS AU**,  
an individual; **RICHARD**  
**DUDGEON**, an individual; **DEAN**  
**BRYAN RAWLINGS**, an individual;  
**CHRISTOPHER QUINTENERO**,  
an individual; **MICHAEL**  
**QUINTENERO**, an individual;  
**TROY WOODY JR.**, an individual;  
**KATY DIANN WOODY**, an  
individual; **THOMAS CORNELIA**,  
an individual; **CORNELIA MEDIA**,  
**LLC.**, a Nevada corporation;  
**KENNETH CHILDS**, an individual;  
**PARAMOUNT INVESTIGATIVE**  
**SERVICES**, a California corporation;  
and **DOES 1-10**, INCLUSIVE

Defendants

Docket No.: No. 2:24cv9601-WLH(JPR)

**COMPLAINT FOR**

1. **VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATION ACT (RICO), 18 U.S.C. § 1962**
2. **VIOLATION OF THE COMPUTER FRAUD AND ABUSE ACT (CFAA), 18 U.S.C. § 1030**
3. **VIOLATION OF CALIFORNIA PENAL CODE § 502 (UNAUTHORIZED ACCESS OF COMPUTERS)**
4. **ATTEMPTED EXTORTION**
5. **AIDING & ABETTING**
6. **CONSPIRACY TO VIOLATE RICO, 18 U.S.C. § 1962(d)**
7. **ASSAULT**
8. **BATTERY**
9. **TRESPASS TO LAND**
10. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
11. **DEFAMATION PER SE**
12. **FALSE LIGHT INVASION OF PRIVACY**

**DEMAND FOR JURY TRIAL**

1 Plaintiff ENZO ZELOCCHI ("ZELOCCHI"), proceeding in pro per, bring  
2 this Complaint for violation of the Racketeer Influenced and Corrupt Organization  
3 Act ("RICO") and the Computer Fraud and Abuse Act ("CFAA"), as well as  
4 related state causes of action, against Defendants ADAM IZA ("IZA"), IRIS AU  
5 ("AU"), RICHARD RAYMOND DUDGEON ("DUDGEON"), DEAN BRYAN  
6 RAWLINGS ("RAWLINGS"), CHRISTOPHER QUINTENERO ("C.  
7 QUINTENERO"), MICHAEL QUINTENERO ("M. QUINTENERO"), TROY  
8 WOODY JR. ("T. WOODY"), KATY WOODY ("K. WOODY"), SPENCER  
9 THOMAS CORNELIA ("CORNELIA"), CORNELIA MEDIA LLC. ("C.  
10 MEDIA"), KENNETH CHILDS ("CHILDS"), PARAMOUNT INVESTIGATIVE  
11 SERVICES ("PARAMOUNT"), and DOES 1-10 ("Defendants") and allege as  
12 follows:

### 13 NATURE OF THE CASE

14 This lawsuit arises from a series of coordinated criminal and unlawful acts  
15 by the Defendants aimed at unlawfully acquiring ZELOCCHI's cryptocurrency,  
16 intimidating ZELOCCHI, and engaging in other unlawful acts. The enterprise  
17 engaged in racketeering activities including extortion, fraud, robbery, kidnapping,  
18 criminal copyright infringement, obstruction of justice, and violations of the  
19 Computer Fraud and Abuse Act (CFAA). These activities caused substantial harm  
20 to ZELOCCHI, including financial losses, damage to their reputations, emotional  
21 distress, and physical harm.

### 22 JURISDICTION AND VENUE

23 1. This Court has jurisdiction over this action pursuant to 28 U.S.C. §  
24 1331 (Federal Question) for claims arising under the Racketeer Influenced and  
25 Corrupt Organizations Act (RICO) 18 U.S.C. §§ 1961–1968 and the Computer  
26 Fraud and Abuse Act (CFAA) 18 U.S.C. § 1030.





1 kidnapping, and defamation to acquire ZELOCCHI's cryptocurrency. IZA's  
2 actions include directing multiple extortion attempts, coordinating criminal  
3 activities, including the kidnapping of ZELOCCHI in Corona, California, and  
4 being involved in physical assaults and battery of ZELOCCHI and those acting as  
5 his agent.

6 7. Defendant IRIS AU ("AU"), is an individual and a California resident  
7 and the girlfriend of Defendant ADAM IZA. On information and belief, AU  
8 allegedly participated in IZA's fraudulent and extortionate efforts by filing a  
9 frivolous lawsuit and financially supporting illegal activities. Evidence presented  
10 in other lawsuits suggests her deeper involvement.

11 8. Defendant RICHARD RAYMOND DUDGEON ("DUDGEON") is  
12 an individual and a former Los Angeles Deputy Sheriff residing in California. On  
13 information and belief, DUDGEON used his knowledge and experience as a  
14 former law enforcement officer to assist IZA in criminal activities that were part of  
15 an extortion scheme. This included coordinating with other defendants in the  
16 kidnapping and armed robbery of ZELOCCHI, providing tactical support to  
17 facilitate the execution of these crimes, and leveraging his former position to help  
18 IZA evade detection and arrest.

19 9. Defendant DEAN BRYAN RAWLINGS ("RAWLINGS") is an  
20 individual and an active Los Angeles County Sheriff's Deputy residing in  
21 California. On information and belief, RAWLINGS used his knowledge,  
22 experience, and resources as a Sheriff's Deputy to assist IZA in criminal activities  
23 that were part of an extortion scheme, including planning and coordinating an  
24 armed robbery and kidnapping of ZELOCCHI at an Arco gas station. RAWLINGS  
25 is also alleged to have helped IZA evade arrest by using his connections and  
26 familiarity with law enforcement procedures, constituting obstruction of justice.

1        10. Defendant CHRISTOPHER QUINTENERO ("C. QUINTENERO"),  
2 an individual and a California resident, is believed to be an active Los Angeles  
3 Deputy Sheriff. On information and belief, C. QUINTENERO used law  
4 enforcement resources to provide IZA with confidential information, violating  
5 department policies.

6        11. Defendant MICHAEL QUINTENERO ("M. QUINTENERO") is an  
7 individual and a California resident, and the brother of Defendant C.  
8 QUINTENERO. On information and belief, M. QUINTENERO participated in the  
9 robbery of non-party DAVID DO ("DO")'s personal belongings, forcibly taking  
10 DO's laptop bag as part of the larger extortion campaign targeting ZELOCCHI.

11        12. Defendant TROY WOODY JR. ("T. WOODY") is an individual and  
12 a resident of California, currently incarcerated in the Philippines. On information  
13 and belief, T. WOODY directed extortion attempts targeting ZELOCCHI from  
14 abroad, including using electronic means to make threats and demands for  
15 cryptocurrency. T. WOODY is further alleged to have coordinated these efforts  
16 with IZA and other co-defendants, actively supporting the extortion scheme despite  
17 his physical absence from the U.S.

18        13. Defendant KATY WOODY ("K. WOODY") is an individual and a  
19 resident of Virginia, and the mother of Defendant T. WOODY. On information and  
20 belief, K. WOODY financially supported her son's extortion efforts and those of  
21 IZA, including funding resources used to carry out the extortion scheme against  
22 ZELOCCHI in California. K. WOODY is further alleged to have played a  
23 supportive role in maintaining communication and financial stability for the  
24 ongoing criminal activities, including sending emails and corresponding with IZA  
25 while he was in California, as part of a coordinated effort to target ZELOCCHI.  
26

1 This communication and financial support directly facilitated the conspiracy and  
2 criminal acts carried out in California.

3 14. Defendant SPENCER THOMAS CORNELIA (“CORNELIA”) is an  
4 individual and a Nevada resident, and the owner of CORNELIA MEDIA. On  
5 information and belief, CORNELIA collaborated with IZA to defame ZELOCCHI  
6 through the publication of false and damaging online content. CORNELIA is  
7 alleged to have used his media company, CORNELIA MEDIA, to disseminate  
8 defamatory statements as part of the broader extortion scheme, causing  
9 reputational harm to ZELOCCHI.

10 15. Defendant CORNELIA MEDIA, LLC. (“C. MEDIA”) is a Nevada  
11 corporation owned by Defendant CORNELIA that, on information and belief,  
12 published defamatory content online that damaged ZELOCCHI’s professional  
13 reputation. CORNELIA MEDIA was a key tool used by CORNELIA and IZA to  
14 harm ZELOCCHI’s reputation as part of the extortion scheme, intentionally  
15 publishing false statements to further the co-conspirators’ objectives.

16 16. Defendant KENNETH CHILDS (“CHILDS”) is an individual and a  
17 California resident, and the manager of PARAMOUNT. On information and belief,  
18 CHILDS conducted illegal surveillance on behalf of IZA to assist in the extortion  
19 and harassment of ZELOCCHI. CHILDS is further alleged to have used  
20 investigative resources to track ZELOCCHI’s whereabouts and movements,  
21 relaying this information to the co-conspirators to aid in their criminal efforts.

22 17. Defendant PARAMOUNT INVESTIGATIVE SERVICES  
23 (“PARAMOUNT”), is a California corporation with its primary place of business  
24 at 633 W. Fifth Street, Los Angeles, California, owned by Defendant CHILDS  
25 that, on information and belief, participated in illegal surveillance of ZELOCCHI  
26 in furtherance of the extortion and defamation scheme. PARAMOUNT was



1 utilized by CHILDS and the co-defendants to gather private information about  
2 ZELOCCHI to be used in furtherance of their criminal activities.

3 18. Defendants Does 1-10 ("DOES") are individuals whose identities are  
4 currently unknown but who, on information and belief, assisted the named  
5 defendants in the unlawful acts described in this complaint. DOES are believed to  
6 have contributed to the extortion, harassment, and defamation of ZELOCCHI by  
7 acting under the direction of the named defendants, furthering the conspiracy.

8 19. Non-party DAVID DO ("DO") is an individual and a California  
9 resident and business consultant. He is a material witness to the defendants' alleged  
10 extortion and defamation efforts. Although not a party to this action, DO was  
11 directly affected by the defendants' wrongful actions, including robbery,  
12 defamation, and harassment, due to his business association with ZELOCCHI. DO  
13 was hired by ZELOCCHI to assist in developing the website for A-Medicare, and  
14 this professional relationship led the defendants to mistakenly believe that DO was  
15 acting as ZELOCCHI's agent. The defendants targeted DO under the mistaken  
16 assumption that DO was in possession of ZELOCCHI's laptop, which stored  
17 valuable cryptocurrency, and sought to obtain it as part of their larger extortion  
18 campaign.

### 19 **FACTUAL BACKGROUND**

#### 20 **I. Formation of the Enterprise and Pattern of Racketeering Activity**

21 20. Defendants IZA, T. WOODY, AU, DUDGEON, RAWLINGS, C.  
22 QUINTENERO, M. QUINTENERO, K. WOODY, CORNELIA, C. MEDIA,  
23 CHILDS, PARAMOUNT, and DOES 1-10 (collectively, the "Defendants"),  
24 formed an association-in-fact enterprise (the "Enterprise") within the meaning of  
25 18 U.S.C. § 1961(4). The Enterprise engaged in a pattern of racketeering activity,  
26 including but not limited to, extortion, fraud, robbery, kidnapping, criminal

1 copyright infringement, obstruction of justice, criminal impersonation, and  
2 violations of the Computer Fraud and Abuse Act (“CFAA”). The Enterprise’s  
3 primary objective was unlawfully acquiring ZELOCCHI’s cryptocurrency,  
4 beginning as early as 2018 when Defendant T. WOODY initially targeted  
5 ZELOCCHI in California. By 2021, IZA, after being introduced to T. WOODY by  
6 their mutual associate Milad Sarwari, began collaborating with T. WOODY to  
7 carry out this goal.

8 21. The Enterprise was formed with the primary objective of unlawfully  
9 acquiring ZELOCCHI’s cryptocurrency by force, threats, and deception, using  
10 intimidation tactics against both ZELOCCHI and individuals associated with him,  
11 such as DO. Initially, T. WOODY targeted ZELOCCHI in 2018, attempting to  
12 extort him through access to his laptop. When T. WOODY was later incarcerated  
13 in the Philippines for murder, he continued his extortion efforts remotely,  
14 eventually conspiring with IZA. This connection, facilitated by Sarwari, helped  
15 solidify their shared intent to seize ZELOCCHI’s cryptocurrency by any means  
16 necessary.

17 22. On or about September 23, 2024, the Department of Justice filed a  
18 criminal complaint against Defendant IZA (Case No. 2:24-mj-05809) in the  
19 Central District of California for conspiracy against rights and evasion of tax  
20 assessments. The investigation, spearheaded by the Federal Bureau of Investigation  
21 (FBI), uncovered significant evidence of extortion, fraudulent activities, and  
22 criminal conspiracy involving IZA and other co-conspirators. This criminal  
23 complaint further corroborates the racketeering activities alleged in this action, as  
24 the same extortion and criminal conduct are detailed in both proceedings.

25 23. FBI investigative findings demonstrate a coordinated effort between  
26 IZA and T. WOODY, along with others, to intimidate and extort ZELOCCHI.



1 Evidence, including text messages and financial records, shows that IZA and T.  
2 WOODY worked in concert to target and harm ZELOCCHI. This collaboration  
3 began after their introduction by Milad Sarwari and continued during T.  
4 WOODY's incarceration in the Philippines. IZA provided support to T. WOODY's  
5 efforts to extort cryptocurrency from ZELOCCHI, and T. WOODY's mother,  
6 Defendant K. WOODY, played a crucial role by providing financial assistance to  
7 facilitate their ongoing criminal activities. K. WOODY's involvement helped  
8 sustain T. WOODY's ability to coordinate with IZA and others, further reinforcing  
9 their participation in a single, unified RICO conspiracy. These findings are  
10 supported by the FBI's investigation, including references to K. WOODY's  
11 financial support in connection with the racketeering activities (Criminal  
12 Complaint, Case No. 2:24-mj-05809, ¶¶ 7-18).

13 24. The Defendants used interstate communications, including emails,  
14 text messages, and social media, to carry out their schemes, which impacted  
15 interstate commerce and caused substantial harm to ZELOCCHI.

## 16 **II. Pattern of Racketeering Activity**

17 25. On or about July 16, 2018, during a business meeting held at the  
18 Chamberlain Hotel in West Hollywood, T. WOODY, through unauthorized access  
19 during ZELOCCHI's visit to the restroom, changed the password to ZELOCCHI's  
20 laptop. This initial breach of security enabled T. WOODY to begin his extortion  
21 attempts, threatening to permanently lock ZELOCCHI out of his laptop and his  
22 cryptocurrency accounts if his demands were not met.

23 26. On October 10, 2018, ZELOCCHI received a threatening email  
24 demanding \$1 million in bitcoins. The sender, identifying himself with the  
25 UGNAZI group, threatened to ruin ZELOCCHI's career and harm his loved ones if  
26 the demands were not met. These threats extended to graphic and vulgar emails

1 and text messages, where T. WOODY threatened ZELOCCHI's family's safety,  
2 leveraging the UGNAZI identity to instill fear and compliance.

3 27. In December 2018, IZA fraudulently induced ZELOCCHI to invest 10  
4 bitcoins (approximately \$30,000) in a cryptocurrency mining software scheme.  
5 The connection between IZA and ZELOCCHI was first established through Milad  
6 Sarwari, an associate of T. WOODY, in or around late October 2018. Sarwari  
7 contacted ZELOCCHI to discuss a potential investment opportunity related to a  
8 project called "Cryptic," which was described as a system designed to improve the  
9 security of cryptocurrency wallets. At that time, Sarwari also introduced  
10 ZELOCCHI to IZA, who later presented the fraudulent investment opportunity.  
11 IZA misrepresented the returns and ceased communication after receiving the  
12 investment, only reappearing in November 2021 with a deceptive apology and  
13 extortion scheme.

14 28. On or about November 2021, CHILDS, through PARAMOUNT, was  
15 hired by IZA to conduct unauthorized surveillance on ZELOCCHI. This  
16 surveillance included photography and video recording within ZELOCCHI's  
17 private residence, and the information gathered was used by Defendants to plan  
18 and execute multiple attacks, including the robbery of DO and the home invasion  
19 of ZELOCCHI's apartment.

20 29. On November 21, 2021, Defendants IZA, DUDGEON, and  
21 RAWLINGS, armed with firearms, forcibly detained ZELOCCHI at an Arco gas  
22 station in Corona, California. They believed the bags in ZELOCCHI's car  
23 contained his cryptocurrency-laden laptop. This kidnapping and robbery occurred  
24 after conspiring with T. WOODY, who helped IZA plan and coordinate the  
25 kidnapping as an alternative means of acquiring the laptop and ZELOCCHI's  
26 cryptocurrency. ZELOCCHI asserts that IZA, T. WOODY, and K. WOODY had

1 planned to capture ZELOCCHI and take the laptop, intending to torture him to  
2 reveal the password to his cryptocurrency wallets. Although the bags were later  
3 returned, the act constituted robbery. The Defendants later provided false  
4 statements to law enforcement to evade arrest and obstruct the investigation.

5 30. In or around March 2022, Defendants, acting as part of the  
6 racketeering enterprise, targeted DO in a series of coordinated criminal actions.  
7 Defendants mistakenly believed that DO was in possession of a laptop containing  
8 ZELOCCHI's cryptocurrency and other sensitive business information. DO had a  
9 business relationship with ZELOCCHI and had been hired to develop the website  
10 for A-Medicare, ZELOCCHI's healthcare venture. The Defendants' mistaken  
11 belief that DO possessed ZELOCCHI's laptop stemmed from surveillance of DO  
12 and ZELOCCHI's interactions. This laptop, in fact, belonged to ZELOCCHI, and  
13 Defendants sought to obtain it through criminal means. The wrongful targeting of  
14 DO was intended to further Defendants' broader scheme of extorting  
15 cryptocurrency from ZELOCCHI by intimidating those associated with him,  
16 including DO.

17 31. On March 12, 2022, Defendant M. QUINTENERO, acting under the  
18 direction of IZA, forcibly took DO's laptop bag, mistakenly believing it contained  
19 ZELOCCHI's laptop with cryptocurrency. This belief likely originated from a  
20 meeting held on the evening of March 5, 2022, when DO met with ZELOCCHI to  
21 review the progress of the A-Medicare website DO was redesigning for  
22 ZELOCCHI's business venture. After the meeting, DO left with his own laptop  
23 bag, and Defendants assumed it contained ZELOCCHI's laptop, either as a mistake  
24 or as part of an effort to intimidate and potentially gain access to ZELOCCHI's  
25 assets. It was later confirmed through discovery in a separate lawsuit involving  
26 IZA, ZELOCCHI, DO, CHILDS, and PARAMOUNT, that Defendants, including



1 IZA, had placed a surveillance team to monitor the March 5, 2022 meeting  
2 between ZELOCCHI and DO. Documents produced by PARAMOUNT during  
3 discovery included photographs of DO leaving ZELOCCHI's residence with his  
4 laptop bag. During his deposition in that case, IZA gave evasive answers when  
5 questioned about the photograph, suggesting uncertainty as to whether DO  
6 possessed ZELOCCHI's laptop. However, this testimony contradicted previous  
7 statements made by IZA regarding the basis for alleging that DO had possession of  
8 ZELOCCHI's laptop. These facts confirm that Defendants began targeting DO  
9 based on their mistaken belief that DO had taken possession of ZELOCCHI's  
10 laptop after this meeting. This theft was part of the broader racketeering scheme  
11 aimed at acquiring access to the cryptocurrency stored on ZELOCCHI's laptop.  
12 The theft of DO's devices, though targeting the wrong individual, demonstrates the  
13 lengths to which Defendants were willing to go to further their extortionate goals.  
14 The stolen laptop bag contained valuable electronic devices and data, further  
15 implicating Defendants in a pattern of criminal behavior aimed at both ZELOCCHI  
16 and his associates.

17 32. Following the theft of DO's laptop, Defendants continued their  
18 extortionate efforts. On or about March 14, 2022, DO began receiving a series of  
19 threatening text messages demanding that he return a laptop allegedly in his  
20 possession. These threats, which included violent threats against DO and his  
21 family, were made by individuals acting under IZA's direction. The threats were a  
22 direct continuation of Defendants' mistaken belief that DO possessed a laptop  
23 belonging to ZELOCCHI. These actions further demonstrate the Defendants'  
24 pattern of racketeering activity aimed at pressuring both DO and ZELOCCHI to  
25 surrender cryptocurrency.  
26

1        33. Later that same day, on March 14, 2022, DO's vehicle was vandalized  
2 by individuals believed to be acting under IZA's orders. The damage to DO's  
3 vehicle was severe and calculated, intended to intimidate him into complying with  
4 Defendants' demands. This act of vandalism was part of the continuing extortion  
5 and intimidation campaign, which was ultimately aimed at ZELOCCHI through  
6 the targeting of DO. Defendants' actions against DO were intended to coerce him  
7 into surrendering what they mistakenly believed was ZELOCCHI's laptop  
8 containing cryptocurrency.

9        34. In a continuation of the intimidation campaign, on March 18, 2022, at  
10 approximately 2:15 AM, an unidentified assailant, believed to be acting under  
11 IZA's direction, threw a cement brick through the back kitchen window of DO's  
12 residence. Although there were no direct eyewitnesses, the act was attributed to  
13 IZA based on the consistent pattern of intimidation and coercion that had been  
14 orchestrated by him in furtherance of the enterprise's objectives. The ongoing  
15 threats and harassment aimed at DO were part of Defendants' broader scheme to  
16 force compliance with their demand for a laptop they believed was in DO's  
17 possession. This attribution to IZA was further supported by subsequent  
18 threatening text messages that specifically referenced the vandalism, which were  
19 sent to DO by individuals acting under IZA's direction, escalating the pressure and  
20 intimidation against DO.

21        35. On March 30, 2022, at approximately 1:20 AM, ZELOCCHI's  
22 apartment in Los Angeles was forcibly entered by three men armed with guns and  
23 knives, one of whom was IZA. IZA and the other intruders attempted to push their  
24 way into the apartment after successfully kicking in the front door. In self-defense,  
25 ZELOCCHI fired several shots from his firearm, causing the intruders to flee. The  
26 incident was documented by the Los Angeles Police Department under Incident

1 #22033000000220. Despite providing this information to law enforcement, no  
2 immediate arrests were made. Following this event, IZA continued to harass  
3 ZELOCCHI, including sending a Telegram message on June 4, 2022, with a video  
4 of the home invasion and further threats.

5 36. As a result of these escalating attacks, ZELOCCHI lived in constant  
6 fear for his life and the safety of those close to him. Having already endured the  
7 trauma of being kidnapped at the Arco gas station in November 2021, followed by  
8 the continued harassment and violent attempts to intimidate him, including the  
9 break-in at his apartment, the psychological toll on ZELOCCHI was immense. He  
10 suffered from severe emotional distress, anxiety, and sleepless nights, haunted by  
11 the knowledge that IZA and his associates were willing to go to extreme lengths to  
12 harm him. The video sent by IZA after the break-in was a deliberate attempt to  
13 exacerbate this fear and suffering, reminding ZELOCCHI of the Defendants'  
14 ongoing threat to his safety. Unable to feel safe anywhere in Los Angeles,  
15 ZELOCCHI was ultimately forced to flee the country to escape the Defendants'  
16 threats. Even while abroad, ZELOCCHI remained in fear of returning to the United  
17 States, knowing that IZA continued to pose a danger to him and his loved ones.  
18 The ongoing threat of violence, combined with IZA's ability to act without  
19 consequence, left ZELOCCHI feeling powerless and deeply fearful of further  
20 harm.

21 37. Beginning in or around May 2022, CORNELIA, through C. MEDIA,  
22 engaged in a defamatory campaign targeting both ZELOCCHI and DO, working in  
23 concert with IZA and T. WOODY to further the objectives of their enterprise. This  
24 campaign included the production and dissemination of multiple defamatory  
25 videos on YouTube, Rumble, Reddit, TikTok, and other social media platforms. In  
26 these videos, CORNELIA appeared on camera, delivering a fabricated and



1 elaborate narrative falsely portraying IZA as a victim and accusing both  
2 ZELOCCHI and DO of criminal activity and fraudulent behavior. This narrative  
3 was crafted by IZA and T. WOODY in collaboration with CORNELIA, and was  
4 laced with accusations that, ironically, mirrored the very actions and criminal  
5 behavior that IZA and his co-conspirators had committed against ZELOCCHI and  
6 DO. Nearly every aspect of CORNELIA's fabricated narrative could be traced back  
7 to actions that IZA and his co-conspirators had taken against ZELOCCHI and DO.  
8 The videos featured publicly available images and video clips of ZELOCCHI  
9 sourced from the internet, along with surveillance photos taken by PARAMOUNT,  
10 some of which were deceptively altered to support the false narrative created by  
11 IZA and T. WOODY. Additionally, in one of the videos, CORNELIA included a  
12 segment that showed a clip from a privately recorded video stored exclusively on  
13 one of DO's stolen devices. CORNELIA used the clip to mock DO's appearance,  
14 ending with an ominous comment intended to intimidate DO, suggesting that he  
15 may eventually find himself running away in fear. This inclusion of stolen footage  
16 serves as circumstantial evidence of IZA's involvement in the theft of DO's  
17 devices and his connection with T. WOODY and CORNELIA. In or around  
18 February 2023, IZA sent a telegram message to ZELOCCHI boasting about his  
19 ongoing efforts to destroy ZELOCCHI's life and further coercing him to comply  
20 with his demands. During this message, IZA admitted to working in collaboration  
21 with T. WOODY, CORNELIA, and another associate, Mir Islam, to execute their  
22 defamatory campaign against ZELOCCHI. It is believed that discovery will reveal  
23 evidence of a \$20,000 payment from IZA to CORNELIA as part of an agreement  
24 to create and distribute the defamatory content, which IZA and T. WOODY had  
25 threatened would ruin ZELOCCHI's reputation. The defamatory campaign also  
26

1 extended to a petition published on change.org, which further damaged the  
2 reputations of both ZELOCCHI and DO.

3 38. On July 7, 2022, Defendants orchestrated an elaborate scheme to  
4 criminally impersonate DO by hacking Disneyland's Instagram account and  
5 posting defamatory content that falsely framed DO as responsible for the breach.  
6 This content included derogatory captions and fabricated statements that portrayed  
7 DO as a hacker, causing significant public humiliation and irreparable damage to  
8 his online reputation. The incident was part of the broader racketeering scheme  
9 aimed at coercing and intimidating DO in order to indirectly pressure ZELOCCHI  
10 into compliance with Defendants' demands. Moreover, this portrayal of DO as a  
11 hacker was later used by IZA in a frivolous lawsuit filed against both ZELOCCHI  
12 and DO. In that lawsuit, IZA falsely alleged that DO was a hacker acting as an  
13 accomplice to ZELOCCHI's purported criminal activities. IZA sought to exploit  
14 the public attention generated by the criminal impersonation and media coverage  
15 of the Disneyland hack to bolster his fabricated narrative. This manipulation of the  
16 media and subsequent litigation illustrates Defendants' ongoing efforts to damage  
17 both DO's and ZELOCCHI's reputations as part of their coordinated campaign of  
18 extortion and intimidation.

19 39. Defendants DUDGEON, RAWLINGS, and C. QUINTENERO  
20 abused their positions as law enforcement officers to illegally access non-public  
21 information about ZELOCCHI and DO. This misuse of law enforcement resources  
22 enabled Defendants to locate and target both individuals with precision, carrying  
23 out multiple coordinated attacks that resulted in financial and emotional harm.

24 40. Defendants T. WOODY, K. WOODY, and IZA conspired to  
25 orchestrate a series of attacks against ZELOCCHI, intending to extort  
26 cryptocurrency and damage his reputation. As part of the conspiracy, they enlisted

1 other members of the Enterprise, including DUDGEON, RAWLINGS, and  
2 QUINTENERO, who played key roles in planning and executing the attacks. The  
3 conspiracy also involved efforts to obstruct law enforcement investigations, using  
4 intimidation tactics and financial resources to maintain the momentum of their  
5 criminal enterprise.

6 41. Defendant K. WOODY played a crucial role in aiding and abetting the  
7 Enterprise by providing financial support to her son, T. WOODY, and co-  
8 conspirator IZA. K. WOODY's involvement was not passive or incidental; she  
9 actively facilitated the extortion scheme by coordinating and supplying funds that  
10 were critical in sustaining the Enterprise's criminal activities. These funds were  
11 used to further the extortion attempts, including financing T. WOODY's continued  
12 coordination with IZA and other members of the Enterprise following his  
13 incarceration in the Philippines. Moreover, based on screenshotted conversations  
14 between K. WOODY and her son, she was fully aware of and in support of the  
15 kidnapping of ZELOCCHI as part of the broader scheme to extort cryptocurrency.  
16 Her financial assistance and support for these criminal activities enabled the  
17 ongoing racketeering efforts directed at ZELOCCHI, including attacks designed to  
18 extort cryptocurrency and undermine his reputation. Her involvement is further  
19 evidenced by communications, financial records, and messages directly linking her  
20 to the broader conspiracy, highlighting her significant role in furthering the  
21 Enterprise's illegal objectives.

22 42. As a result of the escalating violence, harassment, and threats  
23 orchestrated by IZA, T. WOODY, and their co-conspirators, ZELOCCHI was  
24 ultimately forced to flee the country in fear for his life. The Defendants' actions,  
25 including multiple attempts to extort cryptocurrency, violent attacks, and  
26 coordinated efforts to damage his reputation, left ZELOCCHI with no choice but to



1 seek safety abroad. Even while out of the country, ZELOCCHI remained in fear of  
2 further harm due to IZA's continued threats and the ongoing criminal activities of  
3 the Enterprise.

4 **FIRST CAUSE OF ACTION**

5 **Violation of Racketeer Influenced and Corrupt Organizations Act (RICO) 18**

6 **U.S.C. 1964(c) (d)**

7 **(ZELOCCHI Against All Defendants)**

8 43. ZELOCCHI re-alleges and incorporates by reference the foregoing  
9 paragraphs as if fully set forth herein.

10 44. Defendants IZA, T. WOODY, AU, DUDGEON, RAWLINGS, C.  
11 QUINTENERO, M. QUINTENERO, K. WOODY, CORNELIA, C. MEDIA,  
12 CHILDS, PARAMOUNT, and DOES 1-10 formed and participated in an  
13 enterprise within the meaning of 18 U.S.C. § 1961(4), engaging in a continuous  
14 pattern of racketeering activity to extort ZELOCCHI and harm his business and  
15 reputation.

16 45. The enterprise engaged in a pattern of racketeering activity, involving  
17 multiple predicate acts as defined under 18 U.S.C. § 1961(1), including but not  
18 limited to:

- 19 a. **Extortion and attempted extortion:** Defendants threatened  
20 ZELOCCHI with physical harm, reputational damage, and  
21 financial losses unless he surrendered cryptocurrency assets,  
22 including the threats made by T. WOODY demanding \$1 million  
23 in Bitcoin (July 3, 2018), and the physical confrontations at the  
24 Arco gas station and the March 30, 2022 home invasion.

- 1           **b. Investment fraud:** Defendant IZA falsely represented  
2           investment opportunities to ZELOCCHI, leading ZELOCCHI to  
3           invest 10 bitcoins in a fraudulent cryptocurrency venture.
- 4           **c. Fraudulent legal actions:** Defendants AU and IZA each filed  
5           frivolous lawsuits against ZELOCCHI, falsely accusing  
6           ZELOCCHI of wrongful acts with the ulterior motive of  
7           harassment, pressure, and furthering the extortion scheme. These  
8           lawsuits were part of the enterprise's broader efforts to harm  
9           ZELOCCHI's reputation and obstruct justice.
- 10          **d. Robbery and theft:** On November 21, 2021, at the Arco gas  
11          station in Corona, California, Defendants IZA, DUDGEON, and  
12          RAWLINGS forcibly took ZELOCCHI's bags containing  
13          valuable personal and business items. This act was part of the  
14          enterprise's broader scheme to obtain access to ZELOCCHI's  
15          laptop, which they believed contained valuable cryptocurrency.  
16          In a separate incident on March 12, 2022, Defendant M.  
17          QUINTENERO, acting under the direction of IZA, forcibly took  
18          non-party DO's laptop bag, mistakenly believing it contained  
19          ZELOCCHI's laptop with cryptocurrency. These thefts were  
20          motivated by Defendants' desire to unlawfully obtain control  
21          over the cryptocurrency stored on ZELOCCHI's laptop and form  
22          part of their extortionate scheme.
- 23          **e. Kidnapping and robbery:** On November 21, 2021, as part of  
24          the same broader extortion scheme, Defendants IZA,  
25          DUDGEON, and RAWLINGS kidnapped and forcibly detained  
26          ZELOCCHI at an Arco gas station in Corona, California. They

1 believed that the bags in ZELOCCHI's car contained his  
2 cryptocurrency-laden laptop. The robbery of ZELOCCHI's bags,  
3 which occurred alongside the kidnapping, was designed to coerce  
4 him into surrendering control over the cryptocurrency.

5 f. **Computer Fraud and Abuse Act (CFAA) violations:**

6 Defendant T. WOODY altered the password on ZELOCCHI's  
7 laptop without authorization, blocking ZELOCCHI's access to  
8 his cryptocurrency wallet. This unauthorized action was intended  
9 to gain leverage over ZELOCCHI as part of the broader extortion  
10 scheme, with T. WOODY threatening to permanently lock  
11 ZELOCCHI out of his cryptocurrency unless his demands were  
12 met. Additionally, Defendant IZA accessed DO's password-  
13 protected laptop without authorization. Although IZA initially  
14 intended to search the laptop for information or clues to access  
15 ZELOCCHI's cryptocurrency, he instead discovered video  
16 content that he later provided to CORNELIA for use in  
17 publishing defamatory material against ZELOCCHI.

18 g. **Defamation:** Defendants CORNELIA and C. MEDIA used  
19 stolen data obtained from DO's and ZELOCCHI's devices to  
20 produce and disseminate defamatory videos online. These videos  
21 were further supplemented with altered photos and images  
22 obtained through illegal surveillance conducted by  
23 PARAMOUNT and CHILDS on ZELOCCHI and DO, as well as  
24 publicly available images from ZELOCCHI's and DO's social  
25 media accounts and ZELOCCHI's various actor profile pages,  
26 including IMDb. The defamatory videos falsely portrayed



1 ZELOCCHI as a scammer and criminal, with DO depicted as his  
2 accomplice, all in an effort to damage ZELOCCHI's reputation.  
3 This defamation was part of the enterprise's broader scheme to  
4 publicly ruin ZELOCCHI and deliver on their threats, thereby  
5 adding further pressure for ZELOCCHI to comply with the  
6 extortion demands.

- 7 h. **Illegal surveillance:** Defendant CHILDS and PARAMOUNT  
8 INVESTIGATIVE SERVICES conducted unauthorized  
9 surveillance of ZELOCCHI, including the taking of photographs  
10 and video footage within ZELOCCHI's private residences. This  
11 information was used to monitor ZELOCCHI's movements and  
12 intimidate him as part of the extortion scheme.
- 13 i. **Obstruction of Justice:** Defendants IZA, DUDGEON, and  
14 RAWLINGS used their law enforcement connections to obstruct  
15 justice by evading arrest and ensuring video evidence from the  
16 Arco gas station was destroyed. This included leveraging their  
17 influence to prevent internal investigations from moving forward.
- 18 j. **Obstruction of Criminal Investigation:** DUDGEON and  
19 RAWLINGS, in their roles as law enforcement officers, actively  
20 obstructed investigations into the kidnapping of ZELOCCHI.  
21 They used their official capacities to impede criminal inquiries,  
22 ensuring that law enforcement investigations into the  
23 racketeering acts were thwarted.
- 24 k. **Continuity and threat of future harm:** The enterprise engaged  
25 in a continuous pattern of racketeering activity over several  
26 years. The Defendants' ongoing attempts to coerce, defame, and

1 extort ZELOCCHI demonstrate the continuity of the enterprise.  
2 Defendants have indicated a continued interest in pursuing  
3 unlawful activities, particularly if ZELOCCHI relocates to Los  
4 Angeles County, posing an ongoing threat of future harm.

5 46. As a direct and proximate result of Defendants' racketeering activities,  
6 ZELOCCHI has suffered significant financial losses, reputational harm, emotional  
7 distress, and physical injuries. This includes delays in ZELOCCHI's business  
8 venture, A-Medicare, due to the need to relocate and the impact on potential  
9 investors caused by the defamatory campaign.

10 47. ZELOCCHI seeks compensatory damages, treble damages under 18  
11 U.S.C. § 1964(c), punitive damages, and injunctive relief to prevent further illegal  
12 activities by Defendants.

13 **SECOND CAUSE OF ACTION**

14 **Violation of the Computer Fraud and Abuse Act (CFAA), 18 U.S.C. § 1030**  
15 **(ZELOCCHI Against T. WOODY, IZA, M. QUINTENERO, and DOES 1-10)**

16 48. ZELOCCHI re-alleges and incorporates by reference the foregoing  
17 paragraphs as if fully set forth herein.

18 49. Defendants T. WOODY, along with IZA, M. QUINTENERO, and  
19 DOES 1-10, violated the Computer Fraud and Abuse Act, 18 U.S.C. § 1030, by  
20 unlawfully accessing and altering the contents of ZELOCCHI's personal laptop.

21 50. On or about July 3, 2018, T. WOODY, without authorization,  
22 accessed ZELOCCHI's laptop and altered the password to deny him access to his  
23 cryptocurrency wallet stored on the device. This action constituted a violation of  
24 18 U.S.C. § 1030(a)(2)(C) by depriving ZELOCCHI of his ability to access  
25 valuable information and funds.

1        51.        On March 12, 2022, Defendant M. QUINTENERO forcibly took a  
2 laptop bag belonging to DO, which contained valuable electronic devices.  
3 Although this incident involved DO's property, it later became apparent that video  
4 footage stored on one of DO's devices, which included materials related to  
5 ZELOCCHI, was accessed without authorization. This unauthorized access to  
6 footage indirectly connected to ZELOCCHI's personal and business life caused  
7 reputational damage, as the stolen content was later used in defamatory videos  
8 published online.

9        52.        IZA provided the stolen, unauthorized video content to CORNELIA,  
10 who used the stolen data to publish defamatory material about ZELOCCHI and  
11 DO on various online platforms. In these defamatory videos, DO was portrayed as  
12 a hacker, and ZELOCCHI was named as his accomplice, further suggesting that  
13 ZELOCCHI was involved in illegal activities. This portrayal not only damaged  
14 ZELOCCHI's personal reputation but also created doubts about the legitimacy of  
15 his business ventures, including A-Medicare, by associating him with fraudulent  
16 behavior and hacking. The defamatory content, while not directly attacking the  
17 business, nonetheless cast a shadow over ZELOCCHI's operations by implying  
18 that his business could be involved in or associated with illegal activity. This  
19 further compounded the harm to ZELOCCHI's reputation, both personally and  
20 professionally.

21        53.        As a direct and proximate result of the unauthorized access to  
22 ZELOCCHI's laptop and the use of stolen video content, ZELOCCHI suffered  
23 financial losses, significant reputational harm, and emotional distress. The  
24 defamatory portrayal of ZELOCCHI as an accomplice to DO, who was labeled a  
25 hacker, further compounded the damage to ZELOCCHI's professional and  
26 business reputation, including his business venture, A-Medicare. The unauthorized



1 access deprived ZELOCCHI of valuable cryptocurrency and business-related data  
2 essential to his operations.

3 54. ZELOCCHI seeks compensatory damages, punitive damages, and any  
4 other relief the Court deems appropriate under the CFAA, including damages for  
5 financial losses, reputational harm, and the adverse impact on his business  
6 operations.

7 **THIRD CAUSE OF ACTION**

8 **Violation of California Penal Code § 502**

9 **(Comprehensive Computer Data Access and Fraud Act)**

10 **(ZELOCCHI Against T. WOODY, IZA, and DOES 1-10)**

11 55. ZELOCCHI re-alleges and incorporates by reference the foregoing  
12 paragraphs as if fully set forth herein.

13 56. Defendants T. WOODY, IZA, and DOES 1-10 knowingly and  
14 without permission accessed ZELOCCHI's and DO's computer systems, data, and  
15 networks in violation of California Penal Code § 502(c).

16 57. On or about July 16, 2018, T. WOODY unlawfully altered the  
17 password on ZELOCCHI's laptop without permission while ZELOCCHI briefly  
18 left his computer unattended during a business meeting. This unauthorized access  
19 effectively locked ZELOCCHI out of his cryptocurrency wallet, preventing him  
20 from accessing valuable digital assets stored on the device.

21 58. On or about March 12, 2022, Defendant M. QUINTENERO ("M.  
22 QUINTENERO"), acting under IZA's direction, forcibly took DO's laptop bag,  
23 which contained valuable electronic devices and sensitive business data, including  
24 private and confidential business plans related to ZELOCCHI's healthcare venture,  
25 A-Medicare.

1        59.        Following the theft of DO's laptop, IZA accessed DO's password-  
2        protected laptop without permission, obtaining private video footage and other  
3        sensitive data stored on the device. Clips of these private videos were later used by  
4        CORNELIA and C. MEDIA to embarrass and humiliate DO by publicly displaying  
5        the private intimate moments captured by DO in his videos. This video data was  
6        added to and included in defamatory content targeting ZELOCCHI and Do.

7        60.        Defendants' unauthorized access and use of ZELOCCHI's and DO's  
8        digital devices and data were part of a broader extortion scheme, aimed at  
9        leveraging sensitive information for financial gain and reputational damage.

10       61.       The stolen laptops contained valuable business data and proprietary  
11       content essential to ZELOCCHI's business ventures, including designs and  
12       graphics for ZELOCCHI's healthcare business website, A-Medicare. Defendants'  
13       actions significantly impaired ZELOCCHI's ability to conduct business and caused  
14       extensive financial losses.

15       62.       As a direct and proximate result of Defendants' violation of California  
16       Penal Code § 502, ZELOCCHI has suffered significant harm, including financial  
17       losses, reputational damage, and emotional distress.

18       63.       ZELOCCHI seeks compensatory damages, injunctive relief,  
19       foreseeable attorneys' fees, and costs, as well as any other relief deemed  
20       appropriate by the Court, pursuant to California Penal Code § 502(e).

21                    **FOURTH CAUSE OF ACTION**

22                    **Attempted Extortion**

23                    **(ZELOCCHI Against Defendants IZA, T. WOODY, and DOES 1-10)**

24       64.       ZELOCCHI re-alleges and incorporates by reference the foregoing  
25       paragraphs as if fully set forth herein.  
26

1        65. Defendants IZA, T. WOODY, and DOES 1-10 engaged in a pattern of  
2 attempted extortion targeting ZELOCCHI and DO, threatening physical harm,  
3 reputational damage, and financial loss to coerce them into transferring  
4 cryptocurrency assets or information.

5        66. On or about July 3, 2018, T. WOODY, through multiple  
6 communications including via email and Telegram, with some under the guise of  
7 being associated with UGNAZI, a publicly known "hacktivist group," demanded  
8 that ZELOCCHI transfer \$1 million in Bitcoin to him, threatening violence if  
9 ZELOCCHI failed to comply.

10       67. On multiple occasions, IZA demanded that ZELOCCHI surrender his  
11 laptop containing ZELOCCHI's cryptocurrency and repeatedly threatened  
12 ZELOCCHI with violence and reputational harm if he did not comply. IZA used  
13 threats of public humiliation and personal harm to ZELOCCHI, DO, and their  
14 loved ones as leverage to coerce compliance with his demands. In furtherance of  
15 his threats, IZA, with the help of CORNELIA and C. MEDIA, later engaged in a  
16 public smear campaign, falsely accusing ZELOCCHI of stealing a laptop, among  
17 other things, to damage ZELOCCHI's reputation.

18       68. Similarly, Defendants mistakenly believed that DO was in possession  
19 of the same laptop and began directing extortionate threats towards him starting on  
20 March 14, 2022, threatening physical violence against DO and his family if he did  
21 not surrender the laptop.

22       69. Defendants IZA, DUDGEON, and RAWLINGS attempted to extort  
23 ZELOCCHI at the Arco gas station on November 21, 2021, by forcibly taking  
24 ZELOCCHI's bags and demanding the transfer of his cryptocurrency.

25       70. The extortion attempts were part of a broader scheme by Defendants  
26 to gain access to ZELOCCHI's cryptocurrency holdings, while also using



1 defamatory videos and public accusations to ruin ZELOCCHI's reputation in order  
2 to coerce his compliance.

3 71. As a direct and proximate result of Defendants' attempted extortion,  
4 ZELOCCHI suffered significant emotional distress, reputational damage, and  
5 financial harm, including delays in the development of his business venture, A-  
6 Medicare, due to the loss of potential investors who discovered the defamatory  
7 content published by CORNELIA and C. MEDIA.

8 72. ZELOCCHI seeks compensatory damages, punitive damages, and  
9 injunctive relief to prevent further extortion attempts by Defendants.

10 **FIFTH CAUSE OF ACTION**

11 **Aiding and Abetting Attempted Extortion**

12 **(ZELOCCHI Against K. WOODY, IZA, DUDGEON, RAWLINGS,**  
13 **M. QUINTENERO, C. QUINTENERO, CORNELIA, C. MEDIA,**  
14 **and DOES 1-10)**

15 73. ZELOCCHI re-alleges and incorporates by reference the foregoing  
16 paragraphs as if fully set forth herein.

17 74. Defendants K. WOODY, IZA, DUDGEON, RAWLINGS, M.  
18 QUINTENERO, C. QUINTENERO, CORNELIA, C. MEDIA, and DOES 1-10  
19 aided and abetted IZA and T. WOODY in their attempts to extort ZELOCCHI  
20 by providing assistance and resources that facilitated the extortion scheme.

21 75. Defendant K. WOODY, fully aware of T. WOODY's extortion  
22 scheme, provided substantial financial support to ensure T. WOODY could  
23 continue his extortion efforts while incarcerated. This included providing funds to  
24 enable T. WOODY to access communication devices, which were instrumental in  
25 making threats to extort ZELOCCHI from prison.

1       76. Defendants IZA and K. WOODY worked together to enable T.  
2 WOODY's extortion scheme by ensuring he had the means to carry out his threats,  
3 thereby aiding and abetting the attempted extortion.

4       77. Defendant IZA materially assisted in the extortion by coordinating the  
5 physical threats against ZELOCCHI, including the incident at the Arco gas station  
6 on November 21, 2021, where IZA, DUDGEON, and RAWLINGS forcibly took  
7 ZELOCCHI's bags and made demands for cryptocurrency.

8       78. Defendants DUDGEON and RAWLINGS, using their positions as  
9 former and active law enforcement officers, respectively, provided IZA with  
10 substantial assistance, including participating in physical confrontations with  
11 ZELOCCHI and leveraging their law enforcement connections to protect the  
12 extortion scheme and obstruct investigations.

13       79. Defendant M. QUINTENERO aided the extortion scheme by forcibly  
14 mugging DO on March 12, 2022, taking DO's laptop bag containing valuable  
15 electronic devices and data, which was falsely believed to contain ZELOCCHI's  
16 laptop.

17       80. Defendant C. QUINTENERO, acting under the color of his official  
18 position and leveraging access to sensitive law enforcement databases, unlawfully  
19 retrieved private information, including Department of Motor Vehicles (DMV) and  
20 vehicle registration records of ZELOCCHI and his associates. C. QUINTENERO  
21 then provided this information to IZA for remuneration, knowing it would be used  
22 to surveil, track, and intimidate ZELOCCHI and his associates as part of the  
23 extortion scheme.

24       81. The use of this unlawfully obtained data facilitated the Defendants'  
25 efforts to locate, monitor, and pressure ZELOCCHI, making threats against his  
26 family and associates.

1 82. C. QUINTENERO also facilitated the introduction of IZA to M.  
2 QUINTENERO, who directly participated in the physical robbery of non-party  
3 DO, acts integral to the broader extortion effort targeting ZELOCCHI.

4 83. Defendants CORNELIA and C. MEDIA further aided and abetted the  
5 extortion scheme by creating and disseminating defamatory videos about  
6 ZELOCCHI, which included stolen video data provided by IZA. These videos  
7 were part of the overall strategy to harm ZELOCCHI's reputation, coerce  
8 compliance with extortionate demands, and apply additional pressure to damage  
9 ZELOCCHI's personal and business interests.

10 84. The actions of Defendants DUDGEON, RAWLINGS, M.  
11 QUINTENERO, K. WOODY, CORNELIA, Cornelia Media Group, C.  
12 QUINTENERO, and DOES 1-10 were done with full knowledge of the wrongful  
13 nature of the extortion scheme and with the intent to facilitate the achievement of  
14 T. WOODY's objectives.

15 85. As a direct and proximate result of Defendants' aiding and abetting  
16 attempted extortion, ZELOCCHI suffered emotional distress, reputational harm,  
17 fear for his personal safety, and financial losses, including delays to his business  
18 venture, A-Medicare.

19 86. ZELOCCHI seeks compensatory damages, punitive damages, and any  
20 other relief the Court deems appropriate.

21 **SIXTH CAUSE OF ACTION**

22 **Conspiracy to Violate Civil RICO (18 U.S.C. § 1962(d))**  
23 **(ZELOCCHI Against IZA, T. WOODY, AU, DUDGEON, RAWLINGS, M.**  
24 **QUINTENERO, K. WOODY, CORNELIA, C. MEDIA, and DOES 1-10)**

25 87. ZELOCCHI re-alleges and incorporates by reference the foregoing  
26 paragraphs as if fully set forth herein.



1        88. Defendants IZA, T. WOODY, DUDGEON, RAWLINGS, M.  
2        QUINTENER, K. WOODY, CORNELIA, C. MEDIA, and DOES 1-10  
3        knowingly conspired to violate the Racketeer Influenced and Corrupt  
4        Organizations Act (RICO) by participating in a pattern of racketeering activity,  
5        including extortion, fraud, robbery, kidnapping, obstruction of justice, and  
6        defamation, all intended to harm ZELLOCHI.

7        89. Defendants conspired together to conduct and participate, directly  
8        or indirectly, in the conduct of the affairs of an enterprise through a pattern of  
9        racketeering activity, as defined under 18 U.S.C. § 1961(1). The enterprise  
10       engaged in multiple predicate acts, including but not limited to:

- 11            a. Extortion and attempted extortion: Demanding  
12            cryptocurrency from ZELOCCHI under threats of violence  
13            and reputational harm.
  - 14            b. Kidnapping: Defendants IZA, DUDGEON, and RAWLINGS  
15            kidnapped ZELOCCHI as part of their scheme to extort  
16            cryptocurrency from him.
  - 17            c. Defamation: Publicly smearing ZELLOCHI's reputation  
18            through defamatory videos created and disseminated by  
19            CORNELIA and C. MEDIA, using stolen data obtained from  
20            DAVID DO to illustrate fabricated narratives provided by T.  
21            WOODY and IZA.
  - 22            d. Obstruction of justice: Defendants DUDGEON and  
23            RAWLINGS used their law enforcement connections to  
24            obstruct investigations into the criminal acts committed by the  
25            enterprise.
- 26

1 e. Robbery and theft: Defendants IZA, DUDGEON, and  
2 RAWLINGS forcibly took ZELOCCHI's bags at the Arco gas  
3 station, and M. QUINTENERO mugged non-party DO,  
4 stealing his laptop bag.

5 f. Fraudulent legal actions: Defendants IZA and AU filed  
6 frivolous lawsuits to harass ZELOCCHI and divert attention  
7 from their illegal activities.

8 90. Defendant K. WOODY provided substantial financial support to T.  
9 WOODY, enabling him to communicate and continue threatening ZELOCCHI  
10 while incarcerated.

11 91. Defendant C. QUINTENERO unlawfully accessed confidential  
12 information from law enforcement databases to assist Defendant IZA in  
13 tracking and surveilling ZELOCCHI.

14 92. Defendants CORNELIA and C. MEDIA conspired with IZA to  
15 publish defamatory videos to publicly smear ZELOCCHI and undermine his  
16 business reputation, as part of the extortion scheme.

17 93. As part of the conspiracy, Defendants engaged in repeated acts of  
18 extortion, kidnapping, robbery/assault, unauthorized access to protected  
19 devices, and defamation. The kidnapping of ZELOCCHI was one of several  
20 violent acts carried out to coerce him into surrendering cryptocurrency.  
21 Additionally, the unauthorized access to DO's devices, though targeting the  
22 wrong individual, was part of the broader scheme to intimidate and harm those  
23 associated with ZELOCCHI. By using video content stolen from DO's devices in  
24 defamatory videos, Defendants demonstrated their continuous effort to damage  
25 ZELOCCHI's reputation, further evidencing the pattern of racketeering activity  
26

1        94. Each of the Defendants had knowledge of and agreed to the  
2 unlawful objectives of the enterprise, actively participating in and furthering  
3 the conspiracy. The pattern of racketeering activity spanned several years and  
4 included acts of extortion, kidnapping, unauthorized access to protected  
5 devices, and defamation. The conspiracy is ongoing, with a continued threat of  
6 future harm.

7        95. As a direct and proximate result of Defendants' conspiracy to  
8 violate RICO, ZELOCCHI suffered emotional distress, reputational damage,  
9 financial harm, and loss of potential business opportunities.

10        96. ZELOCCHI seeks compensatory damages, treble damages as  
11 authorized by 18 U.S.C. § 1964(c), punitive damages, and any other relief the  
12 Court deems appropriate.

### 13                                    **SEVENTH CAUSE OF ACTION**

#### 14                                    **Assault**

#### 15                    **(ZELOCCHI Against IZA, DUDGEON, RAWLINGS, and DOES 1-10)**

16        97. ZELOCCHI re-alleges and incorporates by reference the foregoing  
17 paragraphs as if fully set forth herein.

18        98. Defendants IZA, DUDGEON, RAWLINGS, and DOES 1-10  
19 engaged in conduct constituting assault against ZELOCCHI, intentionally  
20 performing acts that caused ZELLOCHI to have a reasonable apprehension of  
21 imminent harmful or offensive contact.

22        99. On or about November 21, 2021, at the Arco gas station in Corona,  
23 California, IZA, DUDGEON, and RAWLINGS, acting as part of their extortion  
24 scheme, approached ZELLOCHI, physically threatened him, and forcibly took his  
25 bags. Defendants acted in an aggressive and intimidating manner, creating an  
26 imminent threat of harm and causing ZELOCCHI to reasonably fear for his safety.





1 105. Defendants IZA, DUDGEON, RAWLINGS, and DOES 1-10 engaged  
2 in intentional acts of battery against ZELOCCHI by willfully using physical force  
3 against ZELOCCHI without consent or legal justification.

4 106. On or about November 21, 2021, at the Arco gas station in Corona,  
5 California, Defendants IZA, DUDGEON, and RAWLINGS physically assaulted  
6 ZELOCCHI during a confrontation in which they forcibly took ZELOCCHI's  
7 bags. Defendants applied physical force to ZELOCCHI's person during the  
8 incident as part of their broader extortion scheme, causing ZELOCCHI to  
9 reasonably fear for his physical safety and wellbeing.

10 107. Defendants' actions were part of a coordinated plan to intimidate and  
11 coerce ZELOCCHI into complying with their demands for cryptocurrency and  
12 other valuable assets.

13 108. Defendants' use of force was intentional, willful, and done without  
14 ZELOCCHI's consent, resulting in harmful or offensive contact with  
15 ZELOCCHI's person.

16 109. As a direct and proximate result of Defendants' battery, ZELOCCHI  
17 suffered physical pain, emotional distress, and fear for his personal safety.

18 110. ZELOCCHI seeks compensatory damages, punitive damages, and any  
19 other relief the Court deems just and proper.

20 **NINTH CAUSE OF ACTION**

21 **Trespass to Land**

22 **(ZELOCCHI Against IZA and DOES 1-10)**

23 111. ZELOCCHI re-alleges and incorporates by reference the foregoing  
24 paragraphs as if fully set forth herein.  
25  
26

1 112. On or about March 20, 2022, Defendants IZA and DOES 1-3, without  
2 permission or consent, entered ZELOCCHI's property located at 8630 Burton  
3 Way, Los Angeles, California, which constitutes a willful act of trespass.

4 113. Defendants' entry onto ZELOCCHI's property was unauthorized,  
5 intentional, and conducted without ZELOCCHI's consent, with the intent to  
6 commit unlawful acts, including but not limited to the attempted burglary and/or to  
7 intimidate, harass, and threaten ZELOCCHI.

8 114. As a direct result of Defendants' trespass, ZELOCCHI has suffered  
9 and continues to suffer emotional distress, anxiety, and fear for his personal safety  
10 and security of his property.

11 115. The unauthorized entry by Defendants has caused ZELOCCHI to  
12 incur expenses related to repairing damages incurred by their forced entry and  
13 relocating to help ensure his safety, and has deprived him of the peaceful  
14 enjoyment of his property.

15 **TENTH CAUSE OF ACTION**

16 **Intentional Infliction of Emotional Distress**

17 **(ZELOCCHI Against T. WOODY, IZA, AU, CORNELIA, C. MEDIA, and**  
18 **DOES 1-10)**

19 116. ZELOCCHI re-alleges and incorporates by reference the foregoing  
20 paragraphs as if fully set forth herein.

21 117. Defendants IZA, T. WOODY, DUDGEON, RAWLINGS, and DOES  
22 1-10 intentionally and recklessly engaged in extreme and outrageous conduct  
23 aimed at causing ZELOCCHI severe emotional distress.

24 118. Defendants repeatedly threatened ZELOCCHI with physical violence,  
25 reputational harm, and financial ruin in an effort to coerce compliance with their  
26 extortionate demands. These threats were made in person, through text messages,



1 and through various other forms of communication, including defamatory public  
2 content.

3 119. The conduct of Defendants IZA, DUDGEON, and RAWLINGS at the  
4 Arco gas station on November 21, 2021, where they physically assaulted  
5 ZELOCCHI and took his personal belongings, caused ZELOCCHI to suffer  
6 intense fear, anxiety, and distress for his personal safety.

7 120. On March 30, 2022, Defendant IZA and DOES 1-10 attempted a  
8 home invasion of ZELOCCHI's residence, armed with weapons, further instilling  
9 fear for ZELOCCHI's life and security. ZELOCCHI was forced to defend himself  
10 with a firearm, leading to significant psychological trauma and ongoing emotional  
11 distress.

12 121. Defendant T. WOODY, under the guise of his association with  
13 UGNAZI, threatened ZELOCCHI with violent harm, including demands for  
14 cryptocurrency under threats of death and personal injury.

15 122. As a direct and proximate result of Defendants' intentional and  
16 reckless actions, ZELOCCHI has suffered severe emotional distress, including  
17 anxiety, fear, sleeplessness, and ongoing psychological trauma.

18 123. Defendants' conduct was extreme, outrageous, and beyond the bounds  
19 of decency in a civilized society, warranting significant compensatory and punitive  
20 damages.

21 124. ZELOCCHI seeks compensatory damages, punitive damages, and any  
22 other relief the Court deems just and proper.

23 **ELEVENTH CAUSE OF ACTION**

24 **Defamation Per Se**

25 **(ZELOCCHI Against T. WOODY, IZA, AU, CORNELIA, C. MEDIA, and**  
26 **DOES 1-10)**

1        125. ZELOCCHI re-alleges and incorporates by reference the foregoing  
2 paragraphs as if fully set forth herein.

3        126. Defendants IZA, CORNELIA, C. MEDIA, and DOES 1-10 made and  
4 published false, defamatory statements about ZELOCCHI to third parties,  
5 including the public, through various online platforms, with the intent to harm  
6 ZELOCCHI's reputation.

7        127. Defendant IZA, in coordination with CORNELIA and C. MEDIA,  
8 falsely accused ZELOCCHI of engaging in illegal and unethical conduct, including  
9 theft of a cryptocurrency-containing laptop that ZELOCCHI rightfully owned, and  
10 falsely portrayed ZELOCCHI as a criminal involved in fraudulent activities.

11        128. Defendants CORNELIA and C. MEDIA produced, published, and  
12 disseminated defamatory videos across various platforms such as YouTube,  
13 Rumble, and other social media outlets. These videos falsely portrayed  
14 ZELOCCHI as engaging in criminal conduct, theft, and dishonesty, without any  
15 factual basis, and were disseminated to a wide audience with the specific intent to  
16 damage ZELOCCHI's personal and professional reputation.

17        129. The defamatory statements made by Defendants were false,  
18 unprivileged, and made with actual malice, as Defendants knew the statements  
19 were false or acted with reckless disregard for their truth.

20        130. The statements made by Defendants constitute defamation per se, as  
21 they falsely accused ZELOCCHI of criminal conduct, dishonesty, and moral  
22 turpitude, which are inherently damaging to ZELOCCHI's reputation, both  
23 personally and professionally.

24        131. As a result of the defamatory videos and statements published by  
25 Defendants, ZELOCCHI's professional reputation has been severely damaged. The  
26 false accusations of criminal behavior, including claims that ZELOCCHI is a

1 scammer and fraud, caused him to lose multiple business opportunities and  
2 partnerships, particularly within the entertainment and cryptocurrency industries.

3 132. Specifically, ZELOCCHI's A-medicare business venture suffered  
4 from the defamatory statements, as investors who had previously expressed interest  
5 in the project withdrew their support after discovering the defamatory content.  
6 Additionally, potential investors were deterred from engaging with A-medicare  
7 due to the ongoing smear campaign, further delaying the project's development  
8 and resulting in significant financial harm. The false public portrayal of  
9 ZELOCCHI not only affected his business dealings but also damaged his public  
10 image, leading to canceled projects, diminished credibility, and loss of income.

11 133. Furthermore, ZELOCCHI has suffered severe emotional distress due  
12 to the public nature of these false statements, including humiliation, anxiety, and  
13 damage to personal and professional relationships. He has also incurred significant  
14 costs in attempting to remove defamatory content and counter the false narratives  
15 published online by Defendants, further compounding his financial losses and  
16 emotional trauma.

17 134. ZELOCCHI seeks compensatory damages, presumed damages for  
18 defamation per se, punitive damages to punish Defendants for their malicious  
19 conduct, and any other relief the Court deems just and proper.

20 **TWELFTH CAUSE OF ACTION**

21 **False Light Invasion of Privacy**

22 **(Zelocchi Against T. WOODY, IZA, M. QUINTENERO, CORNELIA, C.**  
23 **MEDIA, CHILDS, PARAMOUNT, and DOES 1-10)**

24 135. ZELOCCHI re-alleges and incorporates by reference the foregoing  
25 paragraphs as if fully set forth herein.  
26



136. Defendants T. WOODY, IZA, M. QUINTENERO, CORNELIA, C. MEDIA, CHILDS, PARAMOUNT, and DOES 1-10 intentionally placed ZELOCCHI in a false light before the public through the dissemination of misleading and defamatory content.

137. Defendants T. WOODY and IZA conspired with CORNELIA and his company C. MEDIA to produce and disseminate a series of defamatory videos on platforms such as YouTube, which cast ZELOCCHI in a false light by creating a highly misleading and untrue impression of ZELOCCHI's character and activities,  
it.

1. For treble damages pursuant to 18 U.S.C. § 1964(c) for Defendants' violations of the Racketeer Influenced and Corrupt Organizations Act (RICO).
2. For punitive damages sufficient to punish Defendants for their malicious, oppressive, and fraudulent conduct, and to deter similar future conduct.
3. For presumed damages, as allowed for defamation per se and false light invasion of privacy, which do not require proof of specific harm due to the inherently damaging nature of the false statements made by Defendants.
4. For an award of reasonable, foreseeable attorneys' fees and costs, as provided by law, including under 18 U.S.C. § 1964(c) and other applicable statutes.
5. For injunctive relief enjoining Defendants from continuing their unlawful conduct, including the publication and dissemination of defamatory content about ZELOCCHI, and further enjoining Defendants

1 from pursuing frivolous lawsuits against ZELOCCHI, or, in the  
2 alternative, for an order dismissing such lawsuits with prejudice.

3 6. For equitable relief, requiring Defendants to return stolen property  
4 belonging to DAVID DO, or, in the alternative, to compensate  
5 ZELOCCHI for the financial losses incurred in covering DAVID DO's  
6 losses.

7 7. For any other relief the Court deems just and proper.

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12 **DEMAND FOR JURY TRIAL**

13 Plaintiff ENZO ZELOCCHI hereby respectfully requests a trial by jury on  
14 all appropriate issues raised in this Complaint.

15  
16  
17  
18 Respectfully submitted,  
19 In Pro Per

20 DATED: November 5, 2024

21  
22  
23 *Enzo Zelocchi*

24 ENZO ZELOCCHI  
25 Self-Represented  
26